

# **Exhibit 6**

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

VIA EMAIL

April 18, 2023

Reuben J. Sequeira, Esq.  
White & Case LLP  
701 Thirteenth Street, N.W.  
Washington, D.C. 20005-3807

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Reuben:

Near the end of the parties' lengthy meet and confer held on March 29, 2023, Plaintiffs explained that certain documents produced by Al Rajhi Bank ("ARB") identify Al Haramain accounts at ARB that do not appear to have been produced as directed by the Court's November 22, 2021 Order (ECF No. 7378). *See* Order at 8 (granting Request Nos. 1-3 and holding: "Each seeks information about accounts ARB held for the three da'wah organizations including deposits and withdrawals from associated accounts. ARB's provision of financial support to these entities and how that support was provided goes to the core of this jurisdictional discovery."). The Al Haramain accounts we have identified are as follows:

- Al Haramain Islamic Foundation Account Nos. [REDACTED]55 and 9/10555. *See* ARB 38573 (January 29, 1997 letter from the Deputy Minister of Islamic Affairs, Saleh bin Abdel Aziz bin Mohamed al ash Sheikh, to the Director General of ARB, explaining that "it is fine to keep Al-Haramain Islamic Foundation's Account No. [REDACTED]55 at your branch No. [REDACTED]"); ARB 38571 (February 3, 1997 letter from the ARB Branches Director of Northern Riyadh, Abdel Rahman Ibrahim al Qassim, to the director of ARB's Al Olaya Street General Branch, referencing Deputy Minister Saleh al Sheikh's January 29, 1997 letter concerning Al-Haramain Islamic Foundation's Account No. 9/10555 and providing his approval to keep the account open); ARB 38565 (September 25, 1997 letter from Al Haramain's Director General, Aqil al Aqil, to the director of ARB's Al Olaya Street General Branch, proving the approved signatories to Account No. [REDACTED]55). Plaintiffs have searched ARB's production and do not believe the bank has produced relevant account statements or Know-Your-Customer ("KYC") records for this Al Haramain account.
- Al Haramain Islamic Foundation Account Nos. [REDACTED]41, [REDACTED]90, [REDACTED]09, [REDACTED]98, [REDACTED]92, [REDACTED]89, [REDACTED]33, [REDACTED]50, [REDACTED]47, [REDACTED]88, and [REDACTED]80. *See* ARB 38535 (listing Al Haramain accounts at ARB and the identification of account signatories, including Aqil al Aqil and Mansour al Kadi). Plaintiffs have searched ARB's production and it does not appear

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the bank has produced relevant account statements or KYC records for these Al Haramain accounts.<sup>1</sup>

• Al Haramain Islamic Foundation Account Nos. [REDACTED]5/9, [REDACTED]9/5, [REDACTED]9/6, [REDACTED]0/3, [REDACTED]0/4, [REDACTED]8/2, [REDACTED]2/2, [REDACTED]3/4, and [REDACTED]7/2. See ARB 38590-91 (listing of Al Haramain accounts at ARB and the identification of account signatories, including Aqil al Aqil and Mansour al Kadi). Plaintiffs have searched ARB's production and it does not appear the bank has produced relevant account statements or KYC records for these Al Haramain accounts.

In light of these omissions, Plaintiffs' independent searches have identified additional Al Haramain and IIRO accounts in operation during the relevant discovery time period. We do not believe responsive account records have been produced for these accounts as well.

- Al Haramain Account No. 9/10555.
- Al Haramain Account No. 6/98998.
- Al Haramain Account No. 2/9292.
- Al Haramain Account No. 166 (Olaya Branch).
- Al Haramain Account No. 5/9889.
- Al Haramain Account No. 16060/7.
- Al Haramain Account No. 18008/4.
- Al Haramain Account No. 15050/7.
- Al Haramain Account No. 66633/1.
- Al Haramain Account No. 9898/6.
- IIRO Account No. 5999.
- IIRO Account No. 77702.
- IIRO Account No. 9/77718.
- IIRO Account No. 9/8539.
- IIRO Account No. 8/5958.
- IIRO Account No. 15015/6.

Plaintiffs will be filing their third motion to compel tomorrow with respect to Plaintiffs' Second Set of Requests for Production of Documents and the issues we agree are at impasse. We also intend to raise this issue with the Court. In the event that ARB promptly produces relevant banking records for the aforementioned accounts, we can advise the Court at that time.

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<sup>1</sup> As we have previously discussed with you during the meet and confer process, the scope of ARB's redactions throughout its production, including the redaction of nearly every Al Haramain and IIRO account number, has made it difficult for Plaintiffs to verify that ARB has fully complied with the Court's November 22, 2021 Order. Plaintiffs have done everything they can to check that ARB has produced all accounts for the charities for the relevant discovery time period.

Reuben J. Sequeira, Esq.  
April 18, 2023

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Best regards,

COZEN O'CONNOR

By: /s/ J. Scott Tarbutton  
J. Scott Tarbutton  
COZEN O'CONNOR  
One Liberty Place  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103  
Tel: (215) 665-2000  
E-mail: [starbutton@cozen.com](mailto:starbutton@cozen.com)

*On behalf of the Plaintiffs' Exec. Committees*

cc: Michael Mahaffey, Esq.  
Sean P. Carter, Esq.  
William N. Clark, Jr., Esq.  
Robert Sheps, Esq.  
James L. Bernard, Esq.  
Patrick N. Petrocelli, Esq.  
Christopher R. LoPalo, Esq.

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